UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA FORT LAUDERDALE DIVISION

CONSUMER FINANCIAL PROTECTION BUREAU,	CASE NO: 9:23-cv-81373-DMM
Plaintiff,	
v.	
FREEDOM MORTGAGE CORPORATION,	
Defendant.	

JOINT NOTICE REGARDING SEALING ISSUES

Pursuant to the Court's instruction to the Parties (Dkt. 65), Plaintiff Consumer Financial Protection Bureau and Defendant Freedom Mortgage Corporation, by and through their undersigned counsel, submit this Joint Notice regarding sealing issues in connection with the Parties' recently filed motions.

On May 20, 2024, counsel for the Parties met and conferred via videoconference to discuss the sealing issues. Counsel for the Parties also followed up via email on May 21, 2024 and May 22, 2024.

After meeting and conferring, the Parties have agreed that the materials that the CFPB and Freedom previously filed on May 16, 2024, in connection with the Parties' respective summary judgment and pre-trial motions (*see* Dkt. Nos. 67, 68, 70, 71, 72, 74, and 75) may be filed publicly, except to the extent any materials contain personally identifiable information. In addition, the Parties have agreed that the redacted exhibits filed by the CFPB in connection with its Opposition to Freedom's Motion to Compel (Dkt. 79-1 and Dkt. 79-5) may be filed publicly, except to the extent any materials contain personally identifiable information. Neither Party will file a motion to seal these materials. With the Court's permission, each Party will publicly file full versions of the documents and exhibits it previously filed, redacting only personally identifiable information from any materials that are filed.

Dated: May 22, 2024 Respectfully submitted,

By: /s/ Herman J. Russomanno III

Herman J. Russomanno III

Fla. Bar No. 21249

herman2@russomanno.com

RUSSOMANNO & BORRELLO, P.A.

Local Counsel for Defendant Freedom Mortgage Corporation Museum Tower – Penthouse 2800

150 West Flagler Street Miami, Florida 33130

Telephone: (305) 373-2101 Facsimile: (305) 373-2103

Mitchel H. Kider Timothy P. Ofak Charlie Cooper Joseph Katz WEINER BRODSKY KIDER PC 1300 19th Street NW, Fifth Floor Washington, DC 20036

Tel: (202) 628-2000 Fax: (202) 628-2011 kider@thewbkfirm.com ofak@thewbkfirm.com cooper@thewbkfirm.com katz@thewbkfirm.com

Attorneys for Defendant

/s/ Emily Holness

Emily Holness Special Florida Bar ID A5503128 New York Bar No. 4947941

Charles Eric Mothander Special Florida Bar ID A5503180

DC Bar No. 1032539

Hallie Ryan Special Florida Bar ID A5503127 Virginia Bar No. 85927

Joseph Lake Special Florida Bar ID A5503154 California Bar No. 246679

Samuel Weinstock Special Florida Bar No. A5503195

Enforcement Attorneys
Consumer Financial Protection Bureau
1700 G Street, NW Washington, DC 20552
Email: charles.mothander@cfpb.gov
Email: emily.holness@cfpb.gov
Email: hallie.ryan@cfpb.gov
Email: joseph.lake@cfpb.gov
Email: samuel.weinstock@cfpb.gov
Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on May 22, 2024, I electronically filed the foregoing document with the Clerk of Court using CM/ECF, which will provide automatic notice to the below listed counsel of record:

Emily Holness
emily.holness@cfpb.gov
Hallie Ryan
hallie.ryan@cfpb.gov
Joseph Lake
joseph.lake@cfpb.gov
Eric Mothander
Charles.mothander@cfpb.gov
Samuel Weinstock
Samuel.weinstock@cfpb.gov
Enforcement Attorneys
Consumer Financial Protection Bureau
1700 G Street, NW
Washington, DC 20552

<u>/s/ Herman J. Russomanno III</u> Herman J. Russomanno III